

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

RENE CABRERA and RM CABRERA  
COMPANY, INC., Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 5:11-cv-1263-EJD

~~[PLAINTIFFS' PROPOSED]~~  
**ORDER REGARDING MAY 31, 2024  
JOINT DISCOVERY LETTER  
BRIEF REGARDING CLASS  
MEMBER IDENTIFYING  
INFORMATION**

Re: Dkt. No. 780

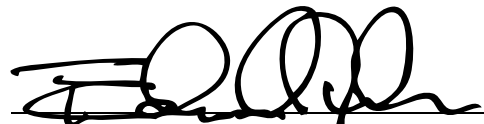
Having considered the Joint Discovery Letter Brief filed regarding Plaintiffs' Request for Class Members' Identifying Information ("Discovery Letter Brief") (Dkt. 780), the arguments of counsel on June 25, 2024, and the parties' subsequent Status Report and agreement (Dkt. 797), the Court rules as follows:

**IT IS HEREBY ORDERED** that Defendant shall produce the requested information associated with the Location Targeting and Search-Bundled click data productions no later than August 2, 2024.

Such production shall be subject to the terms of the Stipulated Protective Order in this case (Dkt. 103) as well as the Additional Data Protections agreed to by the parties (attached hereto as Exhibit 1).

IT IS SO ORDERED.

Dated: July 8, 2024



The Honorable Edward J. Davila  
United States District Judge

**EXHIBIT 1**  
**ADDITIONAL DATA PROTECTIONS AGREED TO BY PARTIES**

**Cabrera v. Google**

**Additional Data Protections for Ads User Information To Be Produced On August 2, 2024**

- These protections (“Additional Data Protections”) apply to the requested contact information, including portions or excerpts of the requested information, and to any work product derived from it that discloses that contact information, including but not limited to any analyses which combine data from the contact information and click data productions and disclose the information of an identifiable person (the “Personal Information”).
- These protections are in addition to all protections for Highly Confidential - AEO documents in the stipulated protective order, Dkt. 103. All individuals who access Personal Information must also meet the requirements to access AEO information in section 7.3 of the Protective Order. In addition, the protections of the protective order for Highly Confidential - AEO information, including but not limited to the provisions on inadvertent disclosure and final disposition, shall apply to this Personal Information.
- **Limits on who can access**
  - Google shall provide the requested contact information via a secure link, which will be made available only to Plaintiffs’ attorneys of record.
  - These counsel shall not share the secure link or Personal Information with any other individuals, except for up to five members of each firm’s staff, any court appointed administrator, Plaintiffs’ expert witnesses Dr. Gibson and Mr. Solomon and their staff members disclosed to Google, and court personnel as may be required (collectively, “Authorized Recipients”).
  - Authorized Recipients who will access Personal Information (including staff members who are Authorized Recipients) will sign an acknowledgement that they have reviewed the protective order, specifically including these Personal Information protections.
  - These Additional Data Protections do not preclude Plaintiffs’ counsel from contacting any individuals or entities identified in the Personal Information and discussing their individual claims and/or damages.
- **Limits on storage method**
  - The data will be produced and stored in encrypted format.
  - The data will be password protected and the password shall only be shared with Authorized Recipients.
  - Reasonable measures must be taken to ensure that any non-electronic copies, such as paper printouts, are not inadvertently disclosed to unauthorized individuals.
- The parties agree that these Additional Data Protections are for pre-trial purposes only. The parties agree to confer regarding the protections that may be needed for this information at trial as part of the process of preparing the joint final pretrial conference statement.